

TLF/12.03.2024

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

NICHOLAS PARKS,

Defendant.

Filed Under Seal

Criminal No.

MJM 24cr352

(Conspiracy to Commit Money
Laundering, 18 U.S.C. § 1956(h);
Forfeiture, 18 U.S.C. § 982(a)(1) and
(b)(1), 21 U.S.C. § 853(p), 28 U.S.C.
§ 2461(c))

INDICTMENT

COUNT ONE

(CONSPIRACY TO COMMIT MONEY LAUNDERING)

The Grand Jury for the District of Maryland charges:

From a date unknown to the Grand Jury but no later than October 2020 and continuing until on or about January 2021, in the District of Maryland and elsewhere, the defendant,

NICHOLAS PARKS,

did knowingly combine, conspire, and agree with persons known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

a. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is a conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841 and 846, knowing that the transactions were designed in whole and in part to

conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

18 U.S.C. §1956(h)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 982(a)(1) and (b)(1), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under Count One of this Indictment.

Money Laundering Forfeiture

2. Upon conviction of the offense alleged in Count One of this Indictment, the defendant,

NICHOLAS PARKS,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1) and (b)(1), any property, real or personal, involved in such offense, or any property traceable to such property. The property to be forfeited includes, but is not limited to, a forfeiture money judgment in the amount of money involved in the money laundering conspiracy described in Count One.

Substitute Assets

3. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided
without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the
forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C.
§ 982(b)(1) and 28 U.S.C. § 2461(c).

18 U.S.C. § 982(a)(1) and (b)(1)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)



ERIK L. BARRON
United States Attorney

A TRUE BILL

SIGNATURE REDACTED

Foreperson

Date: 12-04-24